

# EXHIBIT A

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 RICHARD KADREY, *et al.*,  
12 Individual and Representative Plaintiffs,  
13 v.  
14 META PLATFORMS, INC., a Delaware  
15 corporation;  
16 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**[PROPOSED] ORDER ADOPTING META  
PLATFORMS, INC.'S PROPOSAL  
REGARDING ADDITIONAL DISCOVERY  
PURSUANT TO DKT. 461**

On March 5, 2025, Plaintiffs and Defendant Meta Platforms, Inc. (“Meta”) filed their competing proposals pursuant to the Court’s Order (Dkt. 461). Having considered both parties’ proposals, the Court hereby adopts Meta’s Proposal, rejects Plaintiffs’ proposal, and **ORDERS** the following:

Plaintiffs may take the following additional Rule 30(b)(1) depositions, via Zoom or other remote means, for up to the time limits below:

- Joelle Pineau – 2 hours
- Ahmad Al-Dahle – 2 hours
- Melanie Kambadur – 2 hours
- Todor Mihaylov – 2 hours
- Xiaolan Wang – 3 hours
- Nikolay Bashlykov – 2 hours

With respect to expert reports:

- Plaintiffs may elect to serve a reply report from Dr. Jonathan Krein to Ms. Frederiksen-Cross’s February 11, 2025 rebuttal report. This reply report is limited to specifically responding on the topic of “seeding” addressed in Ms. Frederiksen-Cross’s February 10, 2025 rebuttal expert report, which rebuts Dr. Krein’s January 10, 2025 Opening Report, which was limited to the theory of “seeding.” Plaintiffs may not expand the scope of their reply report to the newly asserted theory of “leeching.” Any such report by Dr. Krein shall be served within 7 days of this Order, and Meta may take a continued deposition of Dr. Krein regarding this reply report (up to three hours).
- If Plaintiffs elect to serve a reply report from Dr. Krein, Meta may serve a further sur-reply report from Ms. Frederiksen-Cross no later than 7 days from service of Dr. Krein’s reply report, and Plaintiffs may take a continued deposition of Ms. Frederiksen-Cross regarding this sur-reply report (up to three hours).
- To the extent Meta seeks to challenge any aspect of Dr. Krein’s reply report under *Daubert* or Rule 37, Meta may do so no later than 7 days from Dr. Krein’s continued deposition.

- No other expert reports will be permitted. In particular, the February 26, 2025 report of Dr. David Choffnes is deemed not timely served and not part of the record of this case. No additional written discovery is permitted.

**IT IS HEREBY ORDERED.**

Dated: \_\_\_\_\_

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HON. VINCE CHHABRIA  
UNITED STATES DISTRICT JUDGE